

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

INNOVATION LAW LAB,

Plaintiff,

v.

No. 22 cv 443 KG/KRS

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT,

Defendant.

JOINT STATUS REPORT

Pursuant to the Court's Scheduling Order, Doc. No. 26, the parties respectfully submit the following Joint Status Report. Defendant has now processed and delivered the requested records to Plaintiff. The results were over 12,564 pages in response to Plaintiff's FOIA request. Given the volume of records produced, Plaintiff needs additional time to review the claimed exemptions of Defendant in order to determine what if any exemption is objectionable and to determine whether the search for responsive records was adequate. Once the review is complete and the Parties have conferred, the Parties will submit either a stipulation of dismissal or a proposed briefing schedule for dispositive motions. The Parties respectfully request 45 days to review the records produced and discuss the results of the review.

Submitted and approved by:

ACLU OF NEW MEXICO
Rebecca Sheff
P.O. Box 566
Albuquerque, NM 87103
T: (505) 266-5915
F: (505) 266-5916
rsheff@aclu-nm.org

COYLE & BENOIT, PLLC
CHRISTOPHER BENOIT

2515 N. Stanton Street
El Paso, Texas 79902
Telephone: (915) 532-5544
Facsimile: (915) 532-5566
chris@coylefirm.com

Attorneys for Plaintiff

ALEXANDER M. M. UBALLEZ
U.S. Attorney
Manual Lucero
Assistant United States Attorney
PO Box 607
Albuquerque, NM 87103
(505) 224-1467; 346-7205 (fax)
manny.lucero@usdoj.gov

Attorneys for Defendant